Message Text

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PAGE 01 STATE 073069

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DRAFTED BY EUR/NE: NACHILLES:DF APPROVED BY EUR/NE: MR. BUELL

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E.O. 11652: N/A
TAGS:BD:EFIN, ETRD
SUBJECT:TAX REDUCTION ACT OF 1975
REF: BUELL/MCCUE TELECON MAR 31

THE FOLLOWING EXCERPT IS FROM A SUMMARY OF THE BILL PROVIDED THE PRESS BY THE TREASURY DEPARTMENT. A FULL TEXT OF THE BILL IS BEING SENT SEPARATELY BY INTERNATIONAL MAIL.

"18. DEFERRAL - CHANGES IN SUBPART F (OF TAX CODE)
-- TERMINATES THE MINIMUM DISTRIBUTIONS EXCEPTION TO SUB-

- -- TERMINATES THE MINIMUM DISTRIBUTIONS EXCEPTION TO SUB-PART F (SECTION 963)
- -- TERMINATES THE EXCEPTION TO SUBPART F WHICH ALLOWS DEFERRAL WHERE TAX HAVEN INCOME IS REINVESTED IN A LESS DEVELOPED COUNTRY CORPORATION
- -- REVISES THE PRESENT RULE PERMITTING DEFERRAL OF TAX ON FOREIGN TAX HAVEN INCOME WHERE LESS THAN 30 PERCENT OF SUCH INCOME IS TAX HAVEN INCOME TO TERMINATE SUCH DEFERRAL WHERE THE TAX HAVEN INCOME EXCEEDS 10 PERCENT OF INCOME
- -- TERMINATES THE EXCEPTION TO SUBPART F FOR SHIPPING INCOME EXCEPT WHERE SUCH INCOME IS REINVESTED IN SHIPPING OPERATIONS
- -- ALLOWS DEFERRAL OF INCOME ON SALES BY A FOREIGN SALES CORPORATION OF AGRICULTURAL PRODUCTS WHICH ARE NOT GROWN IN COMMERCIALLY MARKETABLE QUANTITIES IN THE U.S.
- -- ALL OF THE FOREGOING CHANGES ARE EFFECTIVE IN TAXABLE YEARS BEGINNING AFTER DECEMBER 31, 1975. KISSINGER

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Message Attributes

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Disposition Comment:
Disposition Date: 01 JAN 1960
Disposition Event:
Disposition History: n/a
Disposition Reason:
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Review Authority: ShawDG

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Margaret P. Grafeld Declassified/Released US Department of State EO Systematic Review 05 JÚL 2006

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To: HAMILTÓN

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